

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**The Money Suite Company,**

Plaintiff,

v.

**Farmers Group, Inc.,**

Defendant.

Civil Action No.

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

This is an action for patent infringement in which Plaintiff The Money Suite Company (“Money Suite) makes the following allegations against Farmers Group, Inc. (“Defendant”).

**PARTIES**

1. Money Suite is a Delaware corporation that maintains its principal place of business at 200 W. Broadway, Suite C, Missoula, Montana 59808.
2. On information and belief, Defendant is a Nevada corporation with its principal place of business at 4680 Wilshire Blvd, Los Angeles, CA 90010. Defendant has appointed CSC Services of Nevada 2215-B Renaissance Dr., Las Vegas, NV 89119 as its agent for service of process.

**JURISDICTION AND VENUE**

3. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*, including § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant because, among other reasons, Defendant has done and solicited business in this District, has committed acts of patent infringement in this District, and has harmed Money Suite in this District, by, among other

things, using, selling, offering for sale, and importing infringing products and services in this District.

5. Venue is proper in this District under 28 U.S.C. §§ 1391(b)-(d) and 1400(b) because, among other reasons, Defendant is subject to personal jurisdiction in this District, has transacted business in this District and has committed acts of patent infringement in this District. On information and belief, for example, Defendant has used, sold, offered for sale, and imported infringing products in this District.

**COUNT I**

**INFRINGEMENT OF U.S. PATENT NO. 6,684,189**

6. MoneySuite is the owner as assignee of all rights, title and interest in and under United States Patent No. 6,684,189 ("the '189 patent"), which duly and legally issued on January 27, 2004, with Ronald B. Ryan and Ronald G. Marquart as the named inventors, for an apparatus and method using front-end network gateways and search criteria for efficient quoting at a remote location. Attached hereto as Exhibit A.

7. Defendant has directly infringed at least claim 1 of the '189 patent, in this judicial district and elsewhere in the United States, by, among other things, making, using, importing, offering for sale, and/or selling financial product quotation products and services that fall within the scope of the claims of the '189 patent, including but not necessarily limited to insurance quotation products and services provided at the [www.farmers.com](http://www.farmers.com) website, including, for example, the auto and life insurance quote services on that website. By making, using, importing, offering for sale, and/or selling such products and services which fall within the scope of the '189 patent, including but not limited to using front-end network gateways and selection criteria entered at a remote computer terminal to conduct a search of multiple financial products for efficient quoting at a remote location and all like products and services, Defendants have injured Money Suite and are thus liable for infringement of the '189 patent pursuant to 35 U.S.C. § 271.

8. Defendant has committed these acts of infringement without license or authorization.

9. As a result of Defendant's infringement of the '189 patent, Money Suite has suffered monetary damages in an amount not yet determined, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

10. To the extent that facts learned in discovery show that Defendant's infringement of the '189 patent has been willful, Money Suite reserves the right to request such a finding at the time of trial.

11. As a result of Defendant's infringement of the '189 patent, Money Suite has suffered monetary damages and is entitled to a money judgment in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

12. This is an exceptional case within the meaning of 35 U.S.C. §285.

**PRAYER FOR RELIEF**

Money Suite respectfully requests the following relief:

A. That the Court declare that the '189 patent is valid and enforceable and that its claims have been infringed by Defendant as described herein;

B. That the Court award damages to Money Suite to which it is entitled for patent infringement;

C. That the Court award pre and post judgment interest on the damages to Money Suite;

D. That the Court award to Money Suite its costs and attorneys' fees incurred in this action; and

E. Such other and further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Money Suite, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury on all issues so triable.

June 3, 2013

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)  
919 North Market Street, 12<sup>th</sup> Floor  
Wilmington, Delaware 19801  
(302) 777-0300  
(302) 777-0301 (Fax)  
bfarnan@farnanlaw.com

**ATTORNEYS FOR PLAINTIFF  
THE MONEY SUITE COMPANY**

Of Counsel:

Marc A. Fenster  
Adam S. Hoffman  
Benjamin T. Wang  
Michael T. Boardman  
RUSS, AUGUST & KABAT  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, CA 90025-1031  
(310) 826-7474  
mfenster@raklaw.com  
ahoffman@raklaw.com  
bwang@raklaw.com  
mboardman@raklaw.com